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London Borough of Richmond upon Thames Schedule of Proposed Main Modifications

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory sewerage and water undertaker for the Richmond Borough and are hence a 'specific consultation body' in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments:

Mod Ref: MM46 – Policy 9

We support the amended wording in Part D in relation to early engagement with the water and sewerage company and the potential need for phasing of development and the new wording in paragraph 16.99. However, we object to the deletion of Part F which is directly related and requires the applicants of major developments to provide evidence that capacity exists in the public sewerage and water supply network – this evidence can come from the early engagement with Thames Water.

Water and wastewater infrastructure is essential to any development and capacity should be ensured through the planning process. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), states: "*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*"

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above, the amended text in Part D is supported in relation to early engagement with the water and sewerage company and the potential need for phasing of development is supported. However, we object to the deletion of Part F which is directly related and required the applicants of major developments to provide evidence that capacity exists in the public sewerage and water supply network – this evidence can come from the early engagement with Thames Water. Part F should therefore be reinstated.

Mod Ref: MM47 – Policy 9 Water Resources

We support the additional wording in relation to water efficiency.

Yours faithfully,

David Wilson
Thames Water Property Town Planner